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To : Information Services
Date : 2/13/2022 5:43:17 PM EST, Letter ID: 1413156694
Location : ECF
Housing : 02202LBOTA

Sent by: MICHAEL SALAMI (879045)
Agency: Michigan Department of Corrections
Facility/Housing Unit: Oaks Correctional Facility/02202LBOTA
Date: 02/13/2022 17:46:22

FILED

February 28, 2022 12:22 PM
CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: mic SCANNED BY: *[Signature]*

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

1:22-cv-174
Phillip J. Green
U.S. Magistrate Judge

MICHAEL MOHAMED SALAMI.

CASE NR:

V.
° MICHIGAN DEPT OF CORRECTIONS DIRECTOR ,
° DR. PATRICIA SCHMIDT ,
° GENDER DYSPHORIA RECOMMENDATIONS CHIEF MENTAL HEALTH DOCTOR (UNKNOWN) ,
° CORIZON HEALTH CARE ,
° Lisa Beecher, Carson City Correctional Facility Grievance Coordinator,
° Warden Randee Rewerts , Carson City Correctional Facility ,
° RN # 13- unknown Kelly Carson city Correctional Facility ,
° All unknown GDRC Members (Individual capacity)

42 USCS 1983 CIVIL RIGHTS LITIGATION COMPLAINT :

JURISDICTION: This Honorable Court has Legal Jurisdiction to review this 42 USCS 1983 civil rights complaint as the incidents occurred in the western District Venue between 2019 and 2020

Facts Of Complaint:

1.] Plaintiff, Michael Mohamed Salami, a.k.a. "Tichinea Nikolai", is an Transgender inmate whom is diagnosed by defendant (Schmidt) and the (GDRC) chief psychological unit as (Gender dysphoria) while in the MDOC since roughly 2018 . She is an Opt(outpatient therapy) whom is diagnosed with PTSD due to mitary issues overseas in Ukraine , Mood Disorder, and has had (dozens) of documented Suicide and self injurious behaviors which which serious to the safety of her being i.e (swallowing sharp screws), (self mutilation), (cutting) , (ingestion of dangerous chemicals) , (Attempted overdoses) that are in documented form in the Plaintiffs health file in which the Defendant (Schmidt and GDRC chief psychiatrist) have reliable access to at any time without interference . Plaintiff is on seizure medication and psychotropic medication to stop her from having seizures and from self injuring behavior .

2.] Plaintiff is an Three striker under PLRA standards, however she is within imminent danger of herself at random times of self suicidal ideology due to being discriminated by Defendants and lack of ability to be allowed to practice her Islamic faith freely without reprisal . She is being denied adequate and reasonable mental health and religious garment accomodate detail by defendant (Schmidt) and (GDRC chief psychiatrist) and was denied equal protection of grievance procedure under " conspiracy" issues in an attempt to " thwart" the positive outcome of the grievance by (Lisa Beecher) and by (warden randee Rewerts), and was denied response or adequate medical assistance by Defendant RN# 13 .

3.] On the date of or around 11-13- 2020 while plaintiff was at the MDOC Carson city Correctional Facility, plaintiff was instructed by (non-defendant) , Kyle sleeping, PA) to file a grievance on Dr. Schmidt , and GDRC for denial of matter but to kite medical for an " last ditch effort " before filing an grievance . Plaintiff sent an medical kite to the medical division , GD coordinator (Rn-13, Unknown Kelly) to please receive an detail or accommodation to be allowed to order, purchase and wear an Islamic female hijab head garment from an approved MDOC religious vendor on the date of November 14th, 2020. No response responds or action was taken from the dates of (November 14th 2020 to November 19th, 2020) . plaintiff became aware of an grievable issue on (November 14th, 2020) and tried an step I grievance resolution attempt with RN -13 , Unknown Kelly whom was the person responsible for relaying GD matters to the defendants above. The grievance was filed on DR. Schmidt on November 19th, 2020 but Lisa

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Beecher (defendant) back-dated the receipt date to (11/18/2020) in order to purposely deny the grievance under false assertion of " failure to attempt to resolve" issue . Plaintiff became disgruntled with false findings and despite the step I being returned officially on November 23rd ,2020 as claimed by Lisa Beecher, the grievances wasn't physically received until November 30th, 2020 in which plaintiff timely filed an step ii appeal to warden reverts whom received the step ii appeal on the date of 12/02/2020 and rendered an " upholding" of step I findings without conducting an due diligent investigation of Lisa Beecher findings and failed to raise any " time statute" defense claims of step ii grievance .The step II grievance was returned to plaintiff on 12/22/2020 but the warden rubber stamped the return date to (12/18/2020) . An Step iii final appeal was filed on 1/4/2021 and was rejected and findings upheld without Due diligent investigation . All steps of this grievance were filed under Grievance Id # DRF-2011-2842-281 and no statute of limitation defense were raised.

3.] Defendant Lisa Beecher has an recorded history with the U.S District Court of Michigan under case Number () salami v. Sperling et.al for being dishonest with grievances and falsely rejecting them in aide to cover for workers of MDOC as discovered by Interrogation in which Non defendant, sperling stated " Lisa Beecher at no time contacted me via mail, phone , or in person to varify if plaintiff (salami) tried to resolve matter before Grievance] . wherefore, defendant Lisa Beecher has lost the trust and credibility by this court under [F.R.E -] and is admissible as evidence to prove characterizing the defendant. See attached court ruling proving that Lisa beecher is documented as being dishonest in grievance procedures and is corrupt and lacks an reliable characterizing basis to this court. Anything stated by Lisa Beecher should be handled with the" due diligent" handling as her characterizing image is morally " piss-poor" and " an direct conspiracy grounds claim" . This court is mandated to use the encloses exhibit as reference to credibility and is self authenticated as its an Government document issued by the US western District Court. of Michigan .

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Sent by: MICHAEL SALAMI (879045)
Agency: Michigan Department of Corrections
Facility/Housing Unit: Oaks Correctional Facility/02202LBOTA
Date: 02/13/2022 17:46:07

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illegal or unethical conduct of their staff and denying grievances. The actions of Lisa Beecher are not covered within her official duties and show an abuse of power, discretion and corrupt and "piss- poor " respect towards prisoners constitutional rights . The defendant (rewerts) and (Lisa Beecher) are responsible for the denial of plaintiff ability to posses, purchase , own an hijab and failed to handle the proceeding of the grievance by handing it over to the Health Unit Manager for review to be handled correctly . There was no contact made with RN- 13 unknown Kelly before Denial of grievance by defendant rewerts or Beecher .

4.] The MDOC director Heidi Washington has implemented an policy that appears to be illegal and unethical . Plaintiff is transgender and an Muslim follower of al-islam and is an shia Muslim . If plaintiff wears an hijab, she is faced with the guarantee of being placed into segregation for " impersonating the opposite gender" under sexual misconduct. She would be punished for practicing her Islamic. faith requirements of an hijab mandate to cover her hair at all times . Heidi Washington has implemented an racial, transphobic and unmodernised policy to dissuade trans genders from being able to practice religion freely without government intereference . The plaintiff does not have to file an grievance on the matter as policy issues are non-grievable under MDOC Grievance policy.

5.] Defendant Schmdit, and GDRC unit chief has been aware of this hijab request for over 2.5 years and still refuse to make an accommodation to allow plaintiff the right to wear , own, purchase an Islamic hijab garment from an approved MDOC religious vendor at her own expense despite several dozen documented requests within her (GD file) by Kyle sperling p.a in the years of (2019- 2021) . When plaintiff brings the matter to Schmdit, she is ignored on the matter with " rubbish" of excuses that are merritless .

6.] The defendant(Schmdit) , and (GDRC chief psychiatrist) are aware that plaintiff has PTSD, Mood instability, Depression, and several dozen suicide attempts /self injurious behavior and is medicated to help her minimize her mental health disability symptoms and yet have for the past 2.5 years made it an " mission" to refuse or play " ignorant " and " innocent" by ignoring the request for her to be allowed an GDRC/MDOC approved accomodate detail which allows her to wear, own, purchase and be shielded from any sexual misconduct tickets for wearing her Islamic hijab . Plaintiff has made several requests to the ECF, MRF, RMI, and DRF chaplains for ability to wear and purchae hijab and is denied and told " GDRC/Lansing" has to approve it , since you biologically an male" . The actions of all defendants are with sole intent to deprive plaintiff with an gender affirming medical detail for hijab and aim to deprive her GD care of this topic to dissuade her ability to practice al-islam freely without sanctions or reprisal by MDOC due to her religion or disability. These actions cause plaintiff loss of ability to eat, sleep, cause severe depression, have caused her to act out upon inmates with violence , caused her to be withdrawn from basic things she used to enjoy and sometimes cause an want of suicide or self harm by cutting herself to alievate her spiritual, and mental anguish of being Denis gender affirming care By defendants due to her religion and Gender identity and Disability (Gender Dysphoria) . Denial of Gender Dysphoria care) is an serious issue that is deemed cruel and unusla punishment by defendants. The MDOC and defendants have an sole duty to treat plaintiff with ability to practice her religion freeley and treat her Gender dysphoria with gender affirming care .

7.] plaintiff sues Defendant Lisa Beecher, and rewerts under conspiracy clause to deprive plaintiff of ability to file grievance regarding R.L.U.I.P.A and Denial Of Medical Care , , Schmdit and GDRC Chief psychiatric doctor, and all unknown members Of GDRC under [Cruel and unusual punishment] , (R.L.U.I.P.A , establishment Clause, First amendment right to religious practice , under (individual capacity) and denial to equal protection of law under Fourteenth amendment Establishment clause as Religion and LGBT are protected class under Supreme court ruling, Sues the MDOC director in her individual capacity for violation of First amendment right to freedom of religion. without reprisal from government , right to equal protection of Law under Establishment clause of Fourteenth amendment and RN #13 Unknown Kelly(INDIVIDUAL CAPACITY) for denial of Gender affirming Medical care, and conspiracy to violate R.L.U.I.P.A

PRAYER FOR RELIEF:

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- 1.] Jury trial demand on punitive, nominal and De minimus damage claims ,
- 2.] Punitive damages of \$10,000.00 against Defendant Schmit, GDRC chief psychiatrist, and all unknown GDRC members [Each] for [deprivation of Gender a affirming medical care, R.L.U.I.P.A, Establishment clause, Freedom Of a religion and due process fourteenth amendment equal protection clause. -\$10,000.00 per violation of constitutional right, \$500.00 Nominal damages of Schmit, Chief unknow GDRC psychiatrist and all unknown GDRC members , \$150.00 De minimis damages on defendant Schmit, chief psychiatrist unknown GDRC and all unknown GDRC members (individual capacity) \$5,000.00 punitive damage on Beecher, and reverts and rn 13 unknown Kelly for conspiracy , \$500.00 nominal and \$150.00 De minimise damages

3.) Declaratory Relief on all defendants, including Heidi Washington for R.L.U.I.P.A issue

4.) Injunctive relief on all defendants to allow plaintiff to order , wear , posses Islamic hijab with detail approval,

/S/Michael Mohamed Salami
#879045
1500 Caberfae Hwy
Manistee, MI 49660

Encls.

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Michael Mohamed Salami
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~~Jackson, MI, 49201 USA~~



- Legal Mail -

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